



February 15, 2019

The Honorable Ajit Pai
Chairman
Federal Communications Commission
445 12th Street, SW
Washington, D.C. 20554

Re: NPRM on Unlicensed Use of the 6 GHz Band (ET Docket No. 18-295; GN Docket No. 17-183)

Dear Chairman Pai:

As the Federal Communications Commission reviews comments in this proceeding, the Southern California Public Power Authority (SCPPA), on behalf of two of its member utilities - the Los Angeles Department of Water and Power and the Imperial Irrigation District - urges you to exercise extreme caution as you consider fundamental changes to utilities use of the 6 GHz band for mission-critical communications. Opening this band to unlicensed spectrum sharing would create interference to our microwave communication networks that we use to support the safe and reliable transmission and distribution of power to our customers. Whatever benefit that may be accrued by expanding the use of the 6 GHz band for unlicensed use will be outweighed by the risks to our critical communication networks needed for emergency response, storm restoration and situational awareness of the electric grid infrastructure. We urge you to reconsider the proposals in this rulemaking.

The Los Angeles Department of Water and Power and the Imperial Irrigation District use these microwave systems as the primary telecommunications backbone for their communications networks that carry numerous applications and services. The critical nature of the traffic carried over these networks cannot be overstated. Designed for 'five 9s' of availability, these networks ensure that our members can reliably monitor and control their electric grids. Any congestion or interference from new entrants would impair the safe and reliable delivery of services to the public.

Furthermore, the electric utility sector is the only critical infrastructure sector that has mandatory and enforceable federal standards in place for reliability, cybersecurity and physical security measures that apply across the North American electric grid and Canada. Interference in the 6 GHz spectrum band could significantly impact utilities ability to comply with these standards set by the North American Electric Reliability Corporation (NERC) and could result in civil penalties of up to \$1 million per day per violation for non-compliance.

The Commission's proposed use of an Automated Frequency Control (AFC) system to promote unlicensed use in the 6 GHz band is a highly complex, technical experiment that is currently untested. We urge the Commission to exercise extreme caution as it evaluates this recommendation, as there is no guarantee an AFC system will be 100 percent reliable, which creates an unacceptable risk to safety and stability of the grid itself.

Sincerely,

Michael S. Webster
Executive Director
SCPPA